

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

FILED  
IN CLERK'S OFFICE  
MAR 22 2017  
U.S.  
DC

Rossi Wade  
Plaintiff

V.

Civil Action Number \_\_\_\_\_

The United States Government, Donald Trump  
Defendant(s)

**JURISDICTION**

---

Jurisdiction in this venue is proper. I, Rossi Wade, am a citizen of the United States, I reside at 4 Merchants Row, Plymouth, MA, 02360, and this is where the incident occurred. The defendant(s) The United States Government, President Donald J. Trump, Trump Towers and assets, reside at 1600 Pennsylvania Ave NW, Washington, DC, 20500, the Defendants are nonresident individuals.

**INTRODUCTION**

---

NOW COMES PLAINTIFF, ROSSI WADE, files this complaint and demands a jury trial. ROSSI WADE Pursuant to 28 U.S.C 1346(b) disparate treatment, disparate impact, punitive damages, nominal damages for violations of my First and Fourteenth Amendment rights for: discrimination, mental anguish, and mental cruelty, loss of enjoyment of life, emotional damages and abuse of power.

INCIDENT WHICH BROUGHT THIS CLAIM ABOUT

1. June 16, 2015, at Trump Towers, in New York City, Donald J. Trump started his campaign for President of the United States, and in his campaign for President; Donald J. Trump displayed discriminatory acts against African Americans. Donald J. Trump's stated in reference African Americans, "You're (referring to African Americans) living in poverty, your schools are no good, you have no jobs, 58% of your youth are unemployed –what the hell do you have to lose?"
2. November 8, 2016, Donald J. Trump was elected as President of the United States. From June 16, 2015 until March 20, 2017, I have experienced loss of enjoyment of life, I have been tormented by the thought of him, as well as, sight and the sound of his voice frightens me, I am unable to sleep, focus or believe in a secure future for myself and daughter.
3. Since being elected, Donald J. Trump has signed eighteen executive orders and has previously stated, "Why is President Obama constantly issuing executive orders that are major power grabs of authority?", Donald J. Trump is doing the same thing but has no knowledge of governing, no leadership skills, no communication skills. (what does his presidency have to do with this one)
4. Since being elected as the President of the United States, Donald J. Trump, has been threatened by foreign leaders and he is unwilling to address issues. In Donald J. Trump's first week in office, he ordered an attack on Yemen and as a result, a navy seal was killed. Donald J. Trump never apologized or displayed remorse or acknowledgment it transpired until the family of the soldier came forward.
5. I knew at that point we (Americans) were not safe under his leadership and my night-mares began. I've been under physicians care since June 2015 after the (3<sup>rd</sup>) third week in Donald J. Trump's campaign and am still seeing a physician.

6. The cabinet member Donald J. Trump picked for department of education (Betsy DeVos), has no knowledge of education and it's deeply depressing because I have a daughter in school. Betsy DeVos education values are limited, and after realizing this, I went from sleeping 4 hours a night to 2 hours per night.
7. March 11, 2017, Donald J. Trump began accusing President Obama of "wiretapping" as of March 20, 2017, FBI Director James Comey, stated, "There was no such evidence of wiretapping..." but Trump refuses to adhere to this reasoning.
8. Donald J. Trump ignores threats from North Korea, as well as evidence showing his cabinet picks having ties with Russia but, insists on trying to take health insurance from Americans and defund Plan Parenthood. After hearing the constant negativity, my depression set in.
9. Donald J. Trump has no respect for authority, he received ruling from the court on his immigration ban and stated, "The judge can't tell me what to do he's nobody."
10. In 1999, Donald J. Trump made a comment about dating girls under the age of seventeen. "I have a deal with her. She's seventeen and doing great- Ivanka. She made me promise, swear to her that I would never date a girl younger than her, so as she grows, the field is getting very limited."
11. In 2011, Donald J. Trump called a female journalist a "dog", after rumors of Trump going bankrupt, Trump sent Gail Collins her own article, with her picture circled and "the face of a dog" written across it.
12. Donald J. Trump said, "EPA is a myth and is Fake News", in my life the EPA is real, and I had to have surgery due to smog, air pollution and being unable to breathe. I believe everything Donald J. Trump stands for, or against, is dangerous to our health and well-being. As of this day I am still having difficulty breathing after surgery and Trump states the EPA is no issue.

13. I am a mother rearing my child, trying to maintain a level of respect and teach my child to respect authority. It is straining after hearing Donald J. Trump disrespect authority all the while I am trying to explain he is not above the law. On March 20, 2017, Donald J. Trump had a meeting with German leader, A. Merkel, and stated he needed "more money". This is the United States, we, as a country, should have a leader with some core values, since he has no leadership skills or at least some common sense. He has no respect for women he made that clear while running for office. We all enjoy our first Amendment right, except Elizabeth Warren, who was told to "take her seat" by republicans. Also by the lewd and crude comments that Donald J. Trump made towards women with Billy Bush.

The Aforementioned act(s) by said defendant(s) were negligent for reckless endangerment of: health, safety, and rights of Plaintiff claimant(s). Thereby satisfying the awards of compensatory, punitive, or exemplary damages against the defendant(s); injuries suffered including: varying degrees of emotional trauma, shock, in addition to lost wages. Evidence in this case deems proper for settlement. The facts were not merely alleged; the defendant(s) actions of negligence were the proximate cause of claimant(s) injuries and losses and should be held accountable for each loss, economic and noneconomic. The defendant(s) can't dispute causation of losses and injuries sustained; this case involves negligent act(s) by the defendant(s).

I.

NEGLIGENCE

GAO has established legislation rules and regulation in which Donald J. Trump is supposed to adhere to none the less.

Count 1-3 Re-Alleges

II.

VICARIOUS LIABILITY

Donald J. Trump has a legal liability to act in accordance of laws of the United States. In his continuous act of neglect, in holding the Office, Trump has an obligation and duty to serve in a professional manner and any bias that he may have shouldn't be publicized. The Fourteenth Amendment states, "No state shall deny any person equal protection of the law", Trump refuses to take daily briefings.

Count 1-10 Re-Alleges

III.

STRICT LIABILITY

The defendant(s) had a duty to report and in the reporting details threats to our safety, should be accurate. He shouldn't accuse President or anyone for that matter it opens the U.S. up to attack

Count 1-10 Re-Alleges

DAMAGES

11. The Plaintiff re-alleges paragraph 1-10 as if fully set forth herein

12. As a result of the Defendants conduct, the Plaintiff have suffered the following damages

1. Emotional and mental anguish
2. Physical pain and suffering
3. Loss of enjoyment of life
4. Medical Expenses
5. Economic and noneconomic losses, wages and benefits
6. All other losses arising as a result of the subject incident

PUNITIVE DAMAGES:

12. The Plaintiff re-alleges 1-10 as it fully set forth herein

13. The Plaintiff would show that the acts of the Defendants were intentional, willful, wanton, intensive, careless, reckless, and grossly negligent; that their conduct gives rise to punitive damages and Plaintiffs specifically the award of punitive damages.

WHEREFORE, STRICK LIABILITY AND VICARIOUS LIABILITY CONSIDERED, the Plaintiffs demand judgments of and from Defendants, jointly and severally, for actual and compensatory damages in amount (1) One Billion Dollars sufficient to punish and deter similar misconduct in the future by the Defendant(s) and others.

March 22, 2017  
RESPECTFULLY  
ROSSI WADE  
4MERCHANT  
PLYMOUTH, MA 02360  
617 831-8567  
ro.reedrossi@gmail.com

SEND TO: 229 Quarry St #3213.  
Quincy, Ma 02169